

Exhibit 44:

T.R. Declaration

DECLARATION OF T.R.

1. I am a current registrant on the Michigan Sex Offender Registry. I pled guilty to one count of CSC-1 and one count of CSC-2 in 1992, before Michigan had a sex offender registry. I am a tier III registrant and am required to register for the rest of my life. I am 68 years old and have been on the registry since it started, over 25 years ago. I was released from prison in 2010.

2. I am divorced and have two adult sons. I live alone in a home I own. Before buying my home, I had a lot of difficulty finding housing, so I relied on living with family. I lived with my son in Port Huron for four months, but moved as quickly as my parole allowed to reside in Ann Arbor after my family found an apartment willing to rent to parolees. My current neighborhood is unsafe and I have very little interaction with my neighbors. I have been harassed by neighbors because my address is on the registry. I live alone in large part to spare my friends and family from such harassment.

3. The police periodically visit my home, though they do not come in. Once the police came to my home while I was away. My neighbor called to tell me that the police were banging on my door, though he did not know why. The police sometimes watch me, too. I live near the corner of an intersection, and the police will park on the cross streets in a way that allows them to see into my house and backyard from multiple angles. Their presence is unnerving.

4. I have an Associate of Arts degree in Business from Washtenaw Community College I earned in 2012. During my time at WCC, I was threatened with expulsion because of my registry status. Following my time at WCC, I applied to Eastern Michigan University where I hoped to continue my education. I submitted a statement explaining my conviction in response to the criminal history inquiry and was ultimately rejected. I went on to obtain my Bachelor of Science in Business Administration degree with a major in Accounting from Wayne State University instead in 2013. After that, I obtained my Master of Science degree in Accounting from Wayne State University in 2014.

5. I am retired. My last place of employment was Pizza Hut where I worked as a delivery driver. I worked at Pizza Hut from 2011 to 2020. Pizza Hut was aware of my registry status when I was hired. I left Pizza Hut in 2020 when COVID caused the store to close.

6. Prior to my time at Pizza Hut, I spent much time unemployed following my release from prison. Even after obtaining advanced degrees after striking out on employment, I was still unable to find suitable work. I have submitted multiple applications, and all have been rejected. One such application was for an over-the-phone consulting position with TurboTax. After completing the application process and being hired, the employment offer was withdrawn by higher management despite previous disclosures.

7. I am a licensed mechanic and considered opening a car repair business since employment was tough to come by. Because of the public registry, I was deterred from using online services essential to running a business today as I would have been required to report any online website now necessary to bring traffic to a brick-and-mortar business. Similarly, I have performed professional academic editing on a limited basis and would like to provide online editing services, but I do not feel that I can because of the reporting requirements.

8. I was on parole starting in October 20, 2010 and successfully completed in October 2012. My time on the registry has been very similar to my time on parole. I am forced to report changes of address, employment, volunteering, education, etc. in person within three days, and changes to vehicles, phone numbers, and internet IDs within three days by mail. I am forced to maintain a current photo ID on file which presents me as a current danger for a crime that is over 30 years old. I am forced to pay a fee every year. I have to give notice to travel for more than seven days or to move out of state. I cannot exercise my basic rights without having to notify the government.

9. On parole I never felt I could be violated at any time. My fifty parole conditions were very specific and included pretty basic stuff. If I had questions, I could always call my parole agent and get help. Plus, it only lasted for two years.

10. SORA is the opposite – I feel like no matter what I do or how careful I am, I am almost certainly in danger of coming up short on something. The law is so vague and so complicated, and it governs so many different and loosely defined things, that I am always afraid that whenever I have these mandated contacts with law enforcement I may be arrested, charged, and sent back to prison for an unsuspected violation.

11. The registration process is frustrating. I am required to report in person four times per year. On multiple occasions, I have encountered errors in my registration that staff could not fix. In one instance, I was fingerprinted, but the prints were lost by law enforcement. I had to return in person to be reprinted. Another time, I was told I owed a \$50 fee I had already paid. And the staff didn't know how to fix the issue, so I was at risk of being out of compliance unless I paid the fee again. The outstanding balance was eventually waived after I twice showed proof of payment via my receipt. At times, I have gone to register but have been unable to do so because of staff shortages, forcing me to return the next day – which required taking another day off work. The staff are not very informed about the reporting system (like what has to be reported and what doesn't), so I sometimes leave not knowing if I am compliant or not.

12. In 2014, I suffered heart failure that left me very weak. During one of my reporting periods I avoided leaving home because I was so weak that I had trouble

climbing the stairs of my basement apartment. When I called staff to ask what I should do, they said they did not know and that I should call the state police instead. I called the state police, and they also did not know what to tell me. I was only able to avoid being non-compliant because I recovered just enough to make it to the station to register in person.

13. When I register, I have to sign the Explanation of Duties form. Often, they only have an electronic pad for me to sign, which means I am attesting to having read something which they know I have not read. Even if they have the form I am handed only the signature page and not given the opportunity to look at the form before signing it.

14. There are parts of SORA I do not understand. For instance, I believed I was required to report my mechanic's license as a "professional license" but was told that was unnecessary. Nonetheless, I am required to sign the form or I will be arrested, so I sign it; it does not matter whether I understand or agree with what is on the form.

15. Due to the reporting requirements, visiting family in distant states or enjoying vacations is unrealistic. My sister in Florida wants me to visit. To do so, however, would require me to provide advance notice of my travel plans, register in Florida, and look up the requirements of each state I drive through to make sure I don't have further requirements in those states if I am stopped. For this reason, I avoid traveling

altogether. The last time I traveled was to a friend in Ohio to help his son; I stayed for one night and returned the next day. My understanding is that once you hit three days you are in danger of violation, but I don't know if every state has a different rule. In the end there's just too much risk of getting stopped or having an accident. My biggest fear is that the police can charge me if I miss something on the registry, even if I didn't know about it. So I rarely travel, or keep it really short.

16. The worst part of being on the registry is the fear of strangers harassing me or being publicly humiliated. I have experienced several instances of harassment. In one instance, my son bought an antique wrecker online, but a passerby commented as I was reconditioning it and was told by a neighbor not to talk to me because I am a "bad person." People yell, "Look out for that pedophile!" as I pick up trash outside. People throw trash onto my property as they drive by.

17. Due to reporting requirements, I limit my activities. I avoid seeking employment, buying cars, getting a new phone, traveling, socializing, using social media, buying cellular devices, going to entertainment venues, volunteering at my church, helping others, driving others' cars, upgrading my car, seeking medical care, and much more. I committed my crimes now more than 30 years ago, and I've had no criminal record since. But I'm still monitored and restrained as if I were a clear and present danger to society today.

18. I stay off social media in hopes that it will give me some measure of protection from harassment. I once wanted to join an online support group because it was convenient and free. I did not join, however, because I did not want to have to set up reportable accounts that would be attached to my registration status.

I certify under penalty of perjury that the above statement is true and correct pursuant to 28 U.S.C. § 1746.

T.R.
(name on file with Plaintiffs' counsel)

Dated: March 14, 2023